

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 17-mc-151-LPS

RUSORO MINING LIMITED,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 21-mc-481-LPS

KOCH MINERALS SARL and KOCH
NITROGEN INTERNATIONAL SARL,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 21-mc-156-LPS

GOLD RESERVE INC.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 22-mc-453-LPS

RUSORO'S RESPONSE CONCERNING EXTENSION OF TOPPING BID PERIOD

Rusoro Mining Ltd. ("Rusoro") supports the Venezuela Parties' request for an extension of the Topping Bid Period. Rusoro believes that, in light of the recent decision of the U.S. District Court for the Southern District of New York in *Girard Street Investment Holdings LLC v. PDV Holding, Inc.* (S.D.N.Y. 24-cv-4448), an extension is likely to be consistent with the Court's objective of achieving a value maximizing transaction.

Dated: May 26, 2025

Respectfully submitted,

<p>DLA Piper LLP (US)</p> <p>By: <u>/s/ R. Craig Martin</u> R. Craig Martin (#005032) 1201 North Market Street Suite 2100 Wilmington, DE 19801 Telephone: 302-468-5655 Fax: 302-778-7834 craig.martin@us.dlapiper.com</p> <p>- and -</p> <p>James E. Berger (<i>pro hac vice</i>) Charlene C. Sun (<i>pro hac vice</i>) Joshua S. Wan (<i>pro hac vice</i>) 1251 Avenue of the Americas New York, NY 10020 Telephone: 212-335-4715 Fax: 212-884-8715 James.berger@us.dlapiper.com Charlene.sun@us.dlapiper.com Joshua.wan@us.dlapiper.com</p> <p><i>Attorneys for Rusoro Mining Limited</i></p>	
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